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September 1, 2005

BY ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Re: *IP Enabled Services; E911 Requirements for IP-Enabled Service Providers; WC*
Docket Nos. 04-36, 05-196

VoIP E911 Subscriber Acknowledgement Status Report – September 1, 2005

Dear Ms. Dortch:

Pursuant to the August 26, 2005 *Public Notice* issued by the Enforcement Bureau (DA 05-2358) related to the above-captioned proceedings, Covad Communications hereby submits its VoIP E911 Subscriber Acknowledgement Status Report.

As of today, Covad has obtained affirmative acknowledgments from over 88% of its VoIP subscribers representing more than 86% of our total station count. We expect to obtain acknowledgments from most, if not all, remaining VoIP subscribers by September 28, 2005. Although we cannot estimate of the percentage of remaining subscribers not likely to provide acknowledgements by September 28, 2005, we continue aggressive outreach efforts, including calling each customer, to bring this percentage as close to zero as possible.

Since our status report to the Commission on August 10, 2005, Covad has implemented an escalating plan to contact and obtain affirmative acknowledgments of potential VoIP E911 limitations from its subscribers. To date, we have contacted 100% of our customer base using a variety of methods including overnight mail, electronic mail messages, and multiple telephone calls. Covad will continue these efforts to obtain subscriber acknowledgments over the next several weeks. It is—and has always been—our goal to obtain affirmative acknowledgments from 100% of our customers.

Covad continues to examine the feasibility of implementing a “soft” or “warm” disconnection for any remaining VoIP customers not providing acknowledgments by September 28, 2005. Covad appreciates the Commission’s decision to extend forbearance from enforcement related to VoIP E911 acknowledgments and assures the Commission that it is taking all feasible actions to obtain subscriber acknowledgments while at the same time ensuring continuation of communications service to all of its customers.

Please contact the undersigned with any questions regarding this matter.

Respectfully submitted,

/s/ Angela Simpson

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